

EXHIBIT A

From: [Roberta Kaplan](#)
To: [Moskowitz, Bennet J.](#); [Kyla Magun](#)
Cc: [Glover, Charles L.](#); [arick@thebloomfirm.com](#); [Brad Edwards](#); [dbrodie@yourfloridacounsel.com](#); [abuzin@buzinlaw.com](#); [Brittany Henderson](#)
Subject: Re: Epstein Estate
Date: Tuesday, November 12, 2019 5:15:48 PM

p.s. Please be sure to attach this email to any filing you intend to make to Judge Failla seeking an extension.

Roberta Kaplan
Kaplan Hecker & Fink LLP
350 Fifth Avenue suite 7110
New York, NY 10118
212 763 0883

From: Roberta Kaplan <rkaplan@kaplanhecker.com>
Sent: Tuesday, November 12, 2019 5:14:21 PM
To: Moskowitz, Bennet J. <Bennet.Moskowitz@troutman.com>; Kyla Magun <kmagun@kaplanhecker.com>
Cc: Glover, Charles L. <Charles.Glover@troutman.com>; arick@thebloomfirm.com <arick@thebloomfirm.com>; Brad Edwards <brad@epllc.com>; dbrodie@yourfloridacounsel.com <dbrodie@yourfloridacounsel.com>; abuzin@buzinlaw.com <abuzin@buzinlaw.com>; Brittany Henderson <brittany@epllc.com>
Subject: Re: Epstein Estate

Dear Bennett:

We cannot agree to an extension for a number of reasons set forth below.

First of all, you continue to refuse to explain what documents and information the Estate is preserving or not preserving. As we have now explained several times, that is extremely concerning to us.

Second, you have no non-frivolous basis to file a motion to dismiss in our case. We believe that receiving an answer from your client on November 15 would actually facilitate a potential settlement process. And our client would like to start discovery as soon as possible, particularly given the concerns discussed above.

Third and perhaps most troubling, we have asked you or your colleagues several times about what you envision in terms of a settlement process and have asked to participate in the formulation of whatever it is you propose. I have been involved in settlements like this many times in my career and I have never seen it done unilaterally like the Estate is trying to do here. Settlement, after all, is a two way street. We find it astonishing that you would go to the probate court for approval without first consulting with the lawyers for the many women Mr. Epstein abused. In fact, it feels very much like a continuation of his crimes and abuse after his death.

Very truly yours,

Robbie

Roberta Kaplan
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From: Moskowitz, Bennet J. <Bennet.Moskowitz@troutman.com>
Sent: Tuesday, November 12, 2019 4:55:45 PM
To: Roberta Kaplan <rkaplan@kaplanhecker.com>; Kyla Magun <kmagun@kaplanhecker.com>
Cc: Glover, Charles L. <Charles.Glover@troutman.com>
Subject: Epstein Estate

Hi Roberta:

This week, the Estate will file an application with the USVI court seeking its approval of the Co-Executors' decision to offer a voluntary claims resolution program as a confidential, non-adversarial alternative to litigation. The filing the Estate will be making in the USVI is not itself the detailed program design that will govern the program. Rather, independent claims administration experts will design a detailed program protocol after the filing, with input requested from all interested parties, including you on behalf of your client (and other claimants and their counsel). The claims process will be entirely voluntary, and will not affect any rights your client has unless and until she accepts an independent compensation determination.

The goal is for the program to start receiving claims within around 90 days of approval of the program, with claims determinations made on a rolling basis. Further specifics will be contained in the program protocol.

In light of the foregoing, we would appreciate your consent to extend our response deadline in your SDNY action by three weeks. We believe filing a request this week for a pre-motion to dismiss conference, thereby triggering your 3 business days response deadline, would be counterproductive for all parties and a waste of judicial resources, given the Co-Executors' decision to proceed with a voluntary alternative to litigation.

Best regards,
Bennet

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